

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

EPLUS, INC.,

Plaintiff,

v.

PERFECT COMMERCE, INC.,
SCIQUEST, INC., LAWSON
SOFTWARE, INC., and VERIAN
TECHNOLOGIES, INC.,

Defendants.

Civil Action No. 2:09-CV-232-HCM-TEM

**DEFENDANT LAWSON SOFTWARE, INC.'S RESPONSES TO EPLUS, INC'S FIRST
SET OF INTERROGATORIES (NOS. 1-14)**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant Lawson Software, Inc., ("Lawson") hereby responds to Plaintiff ePlus, Inc.'s ("ePlus") First Set of Interrogatories (Nos. 1-14) as set forth below.

GENERAL OBJECTIONS

1. Lawson generally objects to ePlus's interrogatories to the extent they seek to impose upon Lawson any obligations different from, or in addition to, those obligations imposed by the Federal Rules of Civil Procedure or the Civil Local Rules. Lawson's responses shall be controlled by the requirements imposed by the Federal Rules of Civil Procedure, Federal Rules of Evidence or the applicable Local Rules.

OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

1. Lawson objects to the definitions and instructions as seeking to impose upon Lawson any obligations different from, or in addition to, those obligations imposed by the Federal Rules of Civil Procedure or the Civil Local Rules. Lawson's responses shall be controlled by the requirements imposed by the Federal Rules of Civil Procedure, Federal Rules of Evidence or the applicable Local Rules.

2. Lawson objects to ePlus's definition of "Lawson" as vague, ambiguous, overly broad, and unduly burdensome to the extent that it covers subsidiaries or other related companies whose information and documents are neither relevant to the subject matter of this litigation nor likely to lead to the discovery of admissible evidence, and to the extent it covers persons or entities other than Lawson.

3. Lawson objects to ePlus's definition of "Electronic Sourcing and Procurement System(s) and/or Services" as vague, ambiguous and overly broad in its use of the terms "data regarding an item or items", "sources", "product catalogs", "requisition", "purchase order", "Lawson Procurement", "Lawson Requisitions", "Lawson Inventory Control", "Lawson Purchase Order", and "Lawson Procurement Punchout", and in its use of the phrase "any related applications, systems, methods and services, and any iterations, versions, releases, updates, or components thereof, and any other products and services that incorporate or relate to such products and services".

4. Lawson generally objects to ePlus's definitions as overly broad to the extent they apply a meaning other than the ordinary meaning of the word.

OBJECTIONS AND RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

Identify each person, including, without limitation, all employees, representatives, officers or agents of Lawson or any third parties, whom Lawson knows or has reason to believe has knowledge or information concerning any factual information relevant to the validity or

invalidity, enforceability or unenforceability, or infringement or noninfringement of any of the claims of the patents in suit, or of damages issues in this lawsuit, or of factual information relevant to any allegation of the Complaint or Lawson's answers to any interrogatories served upon it in this case, and state the nature and substance of each such person's knowledge or information, including whether such person furnished information or was consulted regarding Lawson's answers to interrogatories.

OBJECTION TO INTERROGATORY NO. 1:

Lawson objects to Interrogatory No. 1 on all the grounds set forth in its General Objections and incorporates these objections as if set forth in full herein. Lawson further objects that this interrogatory calls for information that is subject to the attorney-client privilege and/or the work product doctrine. Lawson further objects that this interrogatory seeks a legal conclusion. Lawson further objects that this interrogatory is overly broad, vague, ambiguous, unduly burdensome and compound.

RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving its objections, Lawson responds that it has reason to believe that the following individuals have knowledge or information relevant to the issues of this case:

WITNESS	ADDRESS (IF KNOWN)	SUBJECT MATTER
James M. Johnson	Address Unknown	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172
Robert P. Kinross	Address Unknown	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172
Douglas A. Momyer	Address Unknown	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172

WITNESS	ADDRESS (IF KNOWN)	SUBJECT MATTER
Gene A. Tabachnick	Reed Smith LLP 435 Sixth Avenue Pittsburgh, PA 15219	The subject matter claimed in U.S. Patent No. 6,023,683
Michael B. Stewart	Rader, Fishman & Grauer PLLC 39533 Woodward Ave Bloomfield Hills, MI 48304	The subject matter claimed in U.S. Patent Nos. 6,055,516 and 6,505,172
Thomas P. Pavelko	Novak Druce & Quigg LLP 1300 Eye Street, NW 1000 West Tower Washington, D.C. 20005	The subject matter claimed in U.S. Patent No. 6,505,172
Bruce McPheeters, Esq.	c/o Morgan Lewis	Organization and operation of Lawson; Licensing of Lawson technology
Jeff Frank	c/o Morgan Lewis	Marketing and sales of the Accused Lawson Products
Todd Dooner	c/o Morgan Lewis	Technology and development of the Accused Lawson Products
Lori Holman	c/o Morgan Lewis	Documentation related to the Accused Lawson Products
Leon Johnson	c/o Morgan Lewis	Technology and development of the Accused Lawson Products
Richard Patton	c/o Morgan Lewis	Technology and development of the Accused Lawson Products
Dale Christopherson	c/o Morgan Lewis	Technology and development of the Accused Lawson Products
Peter Cornelius	c/o Morgan Lewis	Technology and development of the Accused Lawson Products
Ole Rasmussen	c/o Morgan Lewis	Technology and development of the Accused Lawson Products; Sales of the Accused Lawson Products
Jill Richardson	c/o Morgan Lewis	Technology and development of the Accused Lawson Products
Henrik Billgren	c/o Morgan Lewis	Technology and development of the Accused Lawson Products

WITNESS	ADDRESS (IF KNOWN)	SUBJECT MATTER
Dean Hager	c/o Morgan Lewis	Technology and development of the Accused Lawson Products
Keith Lohkamp	c/o Morgan Lewis	Technology and development of the Accused Lawson Products
Anna Kirsch	c/o Morgan Lewis	Sales of the Accused Lawson Products
Beth Weinberger	c/o Morgan Lewis	Marketing and sales of the Accused Lawson Products; Organization and operation of Lawson
MJ Martis	c/o Morgan Lewis	Marketing and sales of the Accused Lawson Products
Nancy Anderson	c/o Morgan Lewis	Support for the Accused Lawson Products; Organization and operation of Lawson
Charles Gounaris	121 Doray Drive Pittsburgh, PA 15237	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172
Pamela Eng (f/k/a Pamela Jenkins)	7848 Pembridge Rd Manassas, VA 20112-4673	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172
Allen Rolland	16520 Nicarter Ln Gainesville, VA 20155-1945	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172
Kevin French	Address Unknown	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172
Jim Gomola	Address Unknown	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172
Claus Mokawka	Address Unknown	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172
Harry Alexander	Address Unknown	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172
Bill Saville	Address Unknown	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172
Steve Redmond	Address Unknown	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172

WITNESS	ADDRESS (IF KNOWN)	SUBJECT MATTER
Dave Preston	Address Unknown	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172
Anthony Ormston	Address Unknown	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172
Fred Fosbury	Address Unknown	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172
George Brieese	Address Unknown	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172
Nils Gliddy	Address Unknown	The subject matter claimed in U.S. Patent Nos. 6,023,683; 6,055,516; and 6,505,172

Lawson also has reason to believe that one or more employees of Fisher Scientific Company and/or ProcureNet, Inc. have knowledge of the prosecution and scope of the patents-in-suit. Lawson also has reason to believe that one or more employees of International Business Machines Corporation, Lockheed Martin Corporation, and/or McKesson Corporation may have knowledge of prior art to the patents-in-suit.

In addition, for additional information responsive to this interrogatory, ePlus may refer to Lawson's Rule 26(a)(1) initial disclosures.

Lawson reserves the right to supplement its response to this interrogatory, where appropriate, in accordance with its continuing investigation into these matters.

INTERROGATORY NO. 2:

With respect to any of Lawson's Electronic Sourcing and Procurement System(s) and/or Service(s) and/or operations, using a claim chart, state in detail Lawson's bases for any assertions of non-infringement of each of the patents in suit on a claim-by-claim, element-by-

OBJECTION TO INTERROGATORY NO. 12:

Lawson objects to Interrogatory No. 12 on all the grounds set forth in its General Objections and incorporates these objections as if set forth in full herein. Lawson further objects that this interrogatory calls for information that is subject to the attorney-client privilege and/or the work product doctrine. Lawson further objects that this interrogatory is overly broad, vague, ambiguous, unduly burdensome and compound. Lawson further objects to this interrogatory as premature.

RESPONSE TO INTERROGATORY NO. 12:

Subject to and without waiving its objections, Lawson responds that, based on Lawson's investigation to date, it received notice of the patents-in-suit no earlier than the date that ePlus filed an action in the District of Delaware alleging patent infringement by Lawson, May 4, 2009.

Lawson reserves the right to supplement its response to this interrogatory, where appropriate, in accordance with its continuing investigation into these matters.

INTERROGATORY NO. 13:

Identify each factual witness that you intend to call to testify at trial, at any Markman hearing or at any hearing on any dispositive motion in this action and, as to each, identify the witness' full name, address, employer, job title and the expected subject matter of his or her testimony.

OBJECTION TO INTERROGATORY NO. 13:

Lawson objects to Interrogatory No. 13 on all the grounds set forth in its General Objections and incorporates these objections as if set forth in full herein. Lawson further objects to this interrogatory as overbroad and premature in light of the schedule set forth by the Federal

Rules of Civil Procedure and Civil Local Rules and pending further scheduling action by the Court. Lawson further objects that this interrogatory calls for information that is subject to the attorney-client privilege and/or the work product doctrine. Lawson further objects that this interrogatory is overly broad, vague, ambiguous, unduly burdensome and compound. Lawson objects to this interrogatory to the extent it seeks to modify or expand the requirement of the Federal Rules of Civil Procedure and the Civil Local Rules.

RESPONSE TO INTERROGATORY NO. 13:

Subject to and without waiving its objections, Lawson refers ePlus to its initial disclosures and its response to ePlus's Interrogatory No. 1.

Lawson reserves the right to supplement its response to this interrogatory, where appropriate, in accordance with its continuing investigation into these matters.

INTERROGATORY NO. 14:

Identify each system, software application, product and/or service imported, made, offered for sale, sold, licensed, or otherwise distributed by Lawson that has one or more of the following features, functions or capabilities:

- (a) conducting a search for an item in a product catalog or product database;
- (b) creating a requisition for an item;
- (c) generating a purchase order for an item;
- (d) determining the availability of an item in inventory; and
- (e) comparing one or more attributes of an item available from a first source, supplier or vendor, to an item available from a second source, supplier or vendor.

Dated: August 24, 2009



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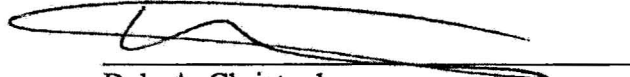
As to the foregoing responses:

VERIFICATION

I, Dale A. Christopherson herein state that:

1. I am authorized to execute this Verification on behalf of Lawson Software, Inc. ("Lawson").
2. I have read Lawson's Responses to ePlus, Inc.'s First Set of Interrogatories (Nos. 1-14) and am familiar with its contents. I hereby declare under penalty of perjury that the answers set forth in that document are true and correct to the best of my knowledge, information and belief.

Dated: 08/24/2009


Dale A. Christopherson

CERTIFICATE OF SERVICE

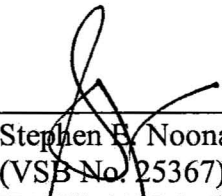
I hereby certify that on August 24, 2009, a true and correct copy of the foregoing document was served by electronic mail upon counsel for the plaintiff:

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